# UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

FILED

NOV **04** 2020

UNITED STATES OF AMERICA,

U.S. DISTRICT COURT-WVND

v.

Criminal No.

1:20 cr84

KENNETH C. RAMDAT,

Defendant. Violations:

18 U.S.C. § 113(a)(5)

18 U.S.C. § 2244(b)

## **INDICTMENT**

The Grand Jury charges that:

#### **COUNT ONE**

(Abusive Sexual Contact)

In or about August 2019, while at the Louis A. Johnson VA Medical Center in the special territorial jurisdiction of the United States, in the Northern District of West Virginia, the defendant **KENNETH C. RAMDAT**, with an intent to abuse, harass, humiliate and degrade Jane Doe 1 and to arouse and gratify the sexual desire of any person, knowingly and intentionally engaged in sexual contact with Jane Doe 1 without her permission by intentionally touching Jane Doe 1's breast, in violation of Title 18, United States Code, Section 2244(b).

## **COUNT TWO**

(Simple Assault)

In or about August 2019, while at the Louis A. Johnson VA Medical Center in the special territorial jurisdiction of the United States, in the Northern District of West Virginia, the defendant **KENNETH C. RAMDAT**, did assault Jane Doe 1 in violation of Title 18, United States Code, Section 113(a)(5).

#### **COUNT THREE**

(Abusive Sexual Contact)

On or about October 17, 2019, while at the Louis A. Johnson VA Medical Center in the special territorial jurisdiction of the United States, in the Northern District of West Virginia, the defendant **KENNETH C. RAMDAT**, with an intent to abuse, harass, humiliate and degrade Jane Doe 2 and to arouse and gratify the sexual desire of any person, knowingly and intentionally engaged in sexual contact with Jane Doe 2 without her permission by intentionally touching Jane Doe 2's breast, in violation of Title 18, United States Code, Section 2244(b).

## **COUNT FOUR**

(Simple Assault)

On or about October 17, 2019, while at the Louis A. Johnson VA Medical Center in the special territorial jurisdiction of the United States, in the Northern District of West Virginia, the defendant **KENNETH C. RAMDAT**, did assault Jane Doe 2 in violation of Title 18, United States Code, Section 113(a)(5).

| A true bill, |      |  |
|--------------|------|--|
|              |      |  |
| <u>/s/</u>   | <br> |  |
| Foreperson   |      |  |

/s/

WILLIAM J. POWELL United States Attorney

Sarah E. Wagner Assistant United States Attorney